

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF AND UPS OVERNIGHT MAIL**

May 27, 2015

The Honorable Frank Maas  
 United States District Court  
 Southern District of New York  
 Daniel Patrick Moynihan U.S. Courthouse  
 500 Pearl Street, Room 740  
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)*

Dear Judge Maas:

In accordance with the Court's Order of May 22, 2015, the Plaintiffs' Executive Committees write to "submit a proposed schedule for filing motions to compel which shall ensure that all such motions are filed by September 30, 2015." ECF No. 2957.

As reflected in the proposed schedule set forth below, plaintiffs anticipate filing motions on a rolling basis. For certain of the defendants, plaintiffs anticipate that multiple motions to compel will be necessary. In those cases, the motions to compel as to such defendants will themselves be filed on a rolling basis, with all such motions to be filed prior to the deadlines applicable to those defendants set forth below.

Consistent with that approach, plaintiffs propose the following schedule for the filing of motions to compel as to the discovery defendants:

June 30, 2015: Deadline for motions to compel as to Dubai Islamic Bank;

July 30, 2015: Deadline for motions to compel as to Wa'el Jelaidan, Soliman H.S. al Buthe, and Perouz Sedaghaty;

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August 15, 2015: Deadline for motions to compel as to Adnan Basha, Abdullah Omar Naseef, Abdullah al Turki, Abdullah al Obaid, and Abdul Rahman al Swailem;

August 30, 2015: Deadline for motions to compel as to Sana-Bell, Inc., Sanabel al Kheer, Inc., and Al Haramain Islamic Foundation, Inc. (USA);

September 30, 2015: Deadline for motions to compel as to Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth-Saudi Arabia, World Assembly of Muslim Youth-International, Dallah Avco, and Yassin Abdullah Kadi.

Plaintiffs note that the feasibility of the schedule proposed above will depend, in part, on the timeliness of the defendants' responses to issues raised during meet and confer processes, and fulfillment of promises made in connection with such discussions.

A proposed form of Order is enclosed for the Court's consideration. Plaintiffs thank the Court in advance for the Court's attention to this matter.

Respectfully submitted,



Sean P. Carter  
THE MDL 1570 PLAINTIFFS' EXECUTIVE  
COMMITTEES

SPC/bdw

cc: The Honorable George B. Daniels (via ECF and UPS)  
MDL-1570 Counsel of Record (via ECF)